

ORIGINAL

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EX PARTE OR LATE FILED



July 28, 1999

Ex Parte

RECEIVED

JUL 28 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 94-1, 96-262/and RM 9210

Dear Ms. Salas:

Yesterday, Mr. Frank Gumper and I, representing Bell Atlantic, met concurrently with Ms. Dorothy Attwood, Legal Advisor to Chairman Kennard, and Ms. Kathryn Brown, Chief of Staff, regarding the item captioned above. The attached material formed the basis of discussion at this meeting.

Any questions on this filing should be directed to me at the address shown above.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Susanne Guyer'.

Attachment

cc: Ms. D. Attwood (letter only)
Ms. K. Brown (letter only)

Petition for Forbearance and Pricing Flexibility



July 27, 1999

Concerns

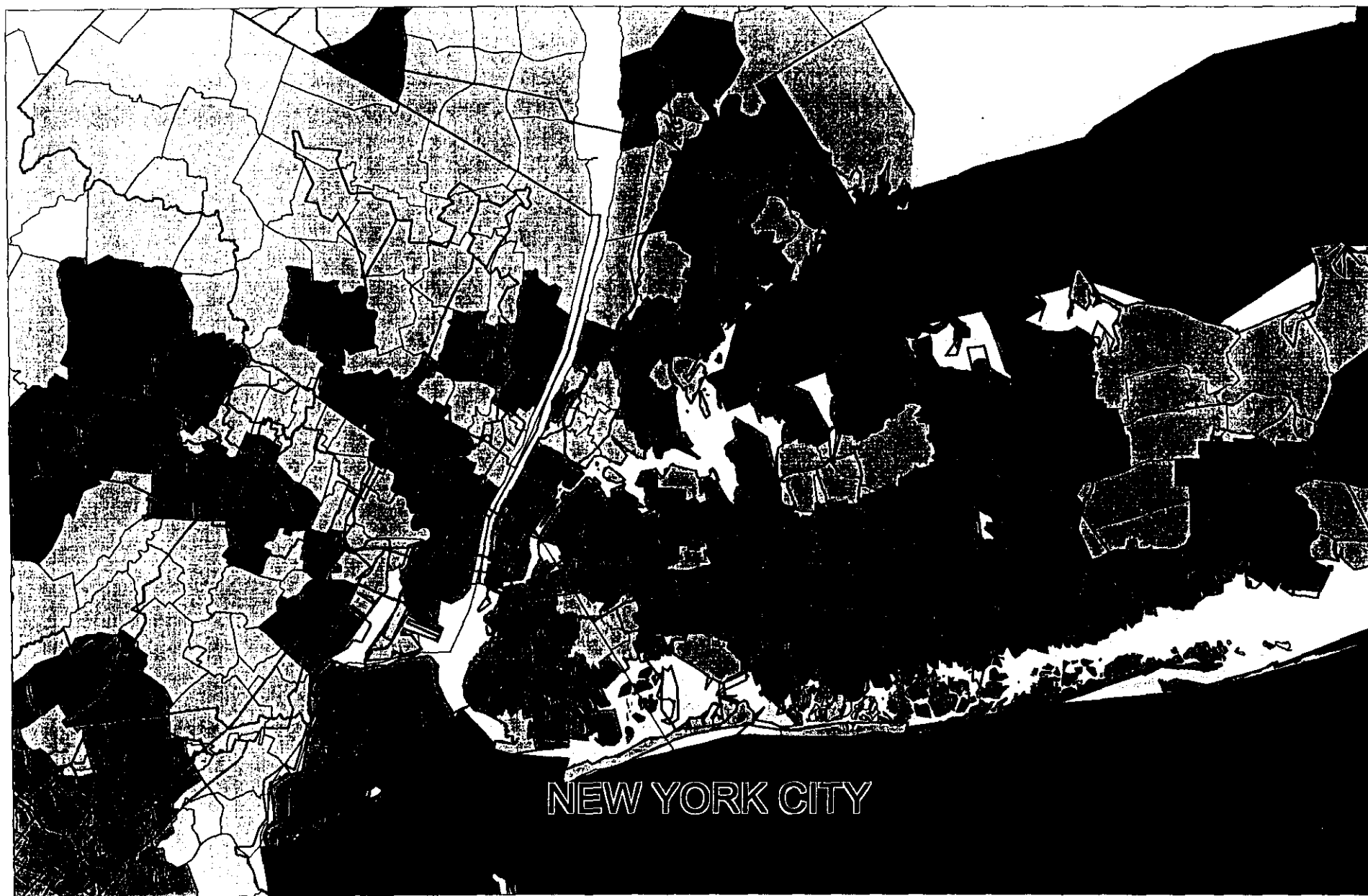
- Special Access relief is two years behind schedule
- Facilities-based competition without collocation
- Criteria for non-MSA relief
- Lower Formula Adjustment

Bell Atlantic

Pricing Flexibility Principles

- Administratively simple process
- Decrease regulation as competition increases
 - » Allow deaveraged rates and targeted rate reductions
 - » Provide clear path for removal of all price regulation
- Criteria and Triggers must be
 - » Explicit
 - » Measurable
 - » Verifiable
- Comprehensive -- must address all markets
 - » Services
 - » Geographic areas

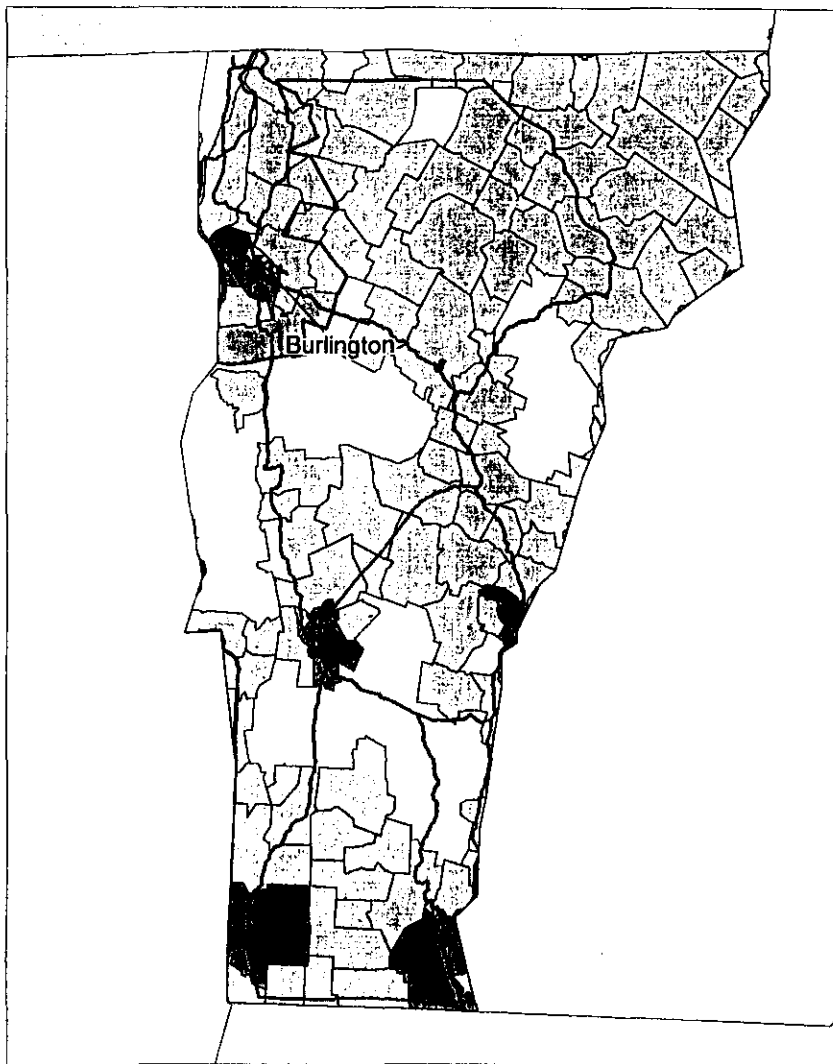
Status of Competition in Metropolitan New York



— Fiber  MSA  BA Wire Center  Coll WC

1 inch = 7 miles

Competition in non-MSA Areas



Vermont
1 inch = 21 miles



Delaware
1 inch = 13 miles

—— Fiber  MSA  BA Wire Center  Coll WC

SUMMARY

- Meaningful relief must include *reasonable* opportunity to remove services from price caps
- Criteria for relief must be *realistically* attainable
- Provisions must also allow for relief for non-MSAs